

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

JONATHAN KING MEYER,

Plaintiff Pro Se,

v

Case No. 1:20-cv-989-RJJ-SJB

Hon. Chief Robert J. Jonker
Mag. Judge Sally J. Berens

ALLEGAN COUNTY/BOB GENETSKI,
STATE OF MICHIGAN/DANNA NESSEL,
KEVIN CRONIN, and ROBERTS KENGIS,
Sued in their personal, official and individual
capacities,

Defendants.

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ROSATI, SCHULTZ, JOPPICH &
AMTSBUECHLER, P.C.
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DEFENDANTS ALLEGAN COUNTY, KEVIN CRONIN, AND ROBERTS KENGIS'
MOTION TO DISMISS

*** Oral Argument Requested ***

Defendants, **ALLEGAN COUNTY, KEVIN CRONIN, and ROBERTS KENGIS**, through its counsel, ROSATI, SCHULTZ, JOPPICH & AMTSBUECHLER, P.C., move this Court for dismissal on Plaintiff's Civil Complaint, under Fed. R. Civ. P. 12(b)(6), as Plaintiff has failed to plead facts sufficient to state viable claims against the Allegan County Defendants. In support of this Motion, Defendants rely on the arguments more fully set forth in the accompanying brief in support.

Concurrence was requested on November 2, 2020, and it was promptly denied on November 3, 2020, necessitating the filing of this Motion.

Respectfully submitted,

ROSATI SCHULTZ JOPPICH &
AMTSBUECHLER, PC

/s/ Andrew J. Brege

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Dated: November 12, 2020

PROOF OF SERVICE

I hereby certify that on November 12, 2020, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system, which will send notification of such filing to the parties/attorneys of record identified in the caption.

Respectfully submitted,

ROSATI SCHULTZ JOPPICH &
AMTSBUECHLER, PC

/s/ Andrew J. Brege

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Dated: November 12, 2020